



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS TX 75202-2733

Sept. 5, 2013

Hecla Mining Company
6500 N. Mineral Dr.
Boise, ID
83815

Attn: Paul Glader, P.E., Manager, Environmental Services

Re: Johnny M Mine Draft Site Investigation Report (SIR)
Settlement Agreement and Administrative Order on Consent (AOC), CERCLA Docket No. 06-11-12

Dear Mr. Glader:

We have reviewed Hecla's proposal for addressing two of EPA's comments on the draft SIR in e-mail correspondence from Mike Schierman of ERG, dated August 19, 2013. Our responses are as follows:

1) *Remove the ITASCA report (Appendix I) from the SIR*

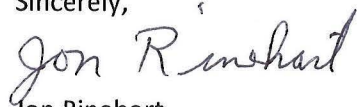
Response: The ITASCA report may be submitted as separate reference document deliverable, but not as part of the SIR since groundwater was specifically not addressed in the agreed scope of the site investigation.

2) *Address soil cleanup standards for the site in the EE/CA via an ARAR analysis. The UMTRCA standard was used in the SIR as a presumed cleanup criterion to present the conservatively lower end of the range of volume estimates. This is supported by EPA's directive OSWER Directive 9200.4-18. This would result in no change to the SIR.*

Response: Any contemplated mitigative actions (non-time critical removal) for the Johnny M Mine site (Site) will be subject to the CERCLA risk-based preliminary remediation goal of 1×10^{-4} lifetime cancer risk or approximately 3.5 pCi/g Ra-226, inclusive of background. This risk-based clean-up level and associated equivalencies are outlined and discussed in detail in OSWER Directive 9200.4-18 dated August 22, 1997. Further, there were some erroneous assumptions made about the use of this directive and the applicability of using UMTRCA clean-up standards as ARARs on calculating volume estimates for this Site. This directive states plainly that UMTRCA regulations can only be applied to UMTRCA sites, and at best the UMTRCA regulations can be viewed as relevant and appropriate requirements (RAR) on UMTRCA-like sites. As agreed and stipulated in the AOC between Hecla and EPA 6, this is not an UMCTRA or UMCTRA-like Site rendering this a moot point. The volumes of soil will need to be recalculated using the aforementioned CERCLA cleanup level.

If you have any questions or comments do not hesitate to contact me at 214-665-6789.

Sincerely,

A handwritten signature in cursive script that reads "Jon Rinehart". The signature is written in dark ink and is positioned above the printed name.

Jon Rinehart

On Scene Coordinator

cc: Mike Schierman, ERG
